

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

CRUZ BAYLON and  
MARIA CARMEN BAYLON,

Plaintiffs,

v.

No. 1:12-cv-00052-MCA-KBM

WELLS FARGO BANK, N.A.; and  
MCCARTHY & HOLTHUS, LLP  
d/b/a MCCARTHY, HOTHUS & LEVINE,

Defendants.

**PLAINTIFFS' MOTION TO COMPEL  
WELLS FARGO TO ANSWER WRITTEN DISCOVERY**

Plaintiffs Cruz and Maria Carmen Baylon move the Court to compel Defendant Wells Fargo Bank, N.A. ("Wells Fargo") to answer written discovery. Wells Fargo opposes this motion.

Prior to filing this motion, the Baylons attempted to resolve these discovery disputes. By letter, email, and by telephone, the parties conferred concerning the dispute, but were unable to resolve some of the issues. The Baylons sets forth more fully their grounds for this motion in the brief that they file in support of this motion.

The Baylons request that the Court order Wells Fargo to provide full and complete responses to Interrogatory No. 8 and Requests for Production Nos. 1, 3, and 5, within 10 days of the entry of the Court's order.

Respectfully submitted,

FEFERMAN & WARREN, attorneys for Plaintiffs

/s/ Charles Parnall

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